

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Davis v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1716-CC;
Saengsiphon v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1719-CC;
Speight v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1718-CC;
Worthen v. World Championship Wrestling, Inc., and Turner Sports, Inc., Civ. File No. 1:00-CV-1717-CC;
Reeves v. World Championship Wrestling, Inc., and Turner Sports, Inc., Civ. File No. 1:00-CV-1720-CC;
Easterling v. World Championship Wrestling, Inc., and Turner Sports, Inc., Civ. File No. 1:00-CV-1715-CC;
Onoo v. World Championship Wrestling, Inc., and Turner Sports, Inc., Civ. File No. 1:00-CV-0368-CC;
Norris v. World Championship Wrestling, Inc., and Turner Sports, Inc., Civ. File No. 1:00-CV-0369-CC;
Walker v. World Championship Wrestling, Inc., and Turner Sports, Inc., Civ. File No. 1:00-CV-0367-CC;
Patterson v. World Championship Wrestling, Inc., Turner Sports, Inc., and Turner Entertainment Group, Inc., Civ. File No. 1:00-CV-1152-CC

DEPOSITION OF HARRISON NORRIS, JR.

MARCH 4, 2002

10:00 a.m.

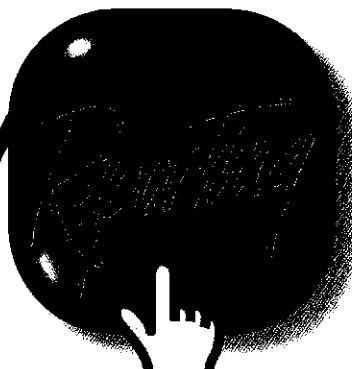
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1 APPEARANCES OF COUNSEL:

2 On behalf of the Plaintiffs:

3 CARY ICHTER, Esq.
4

5 On behalf of the Defendants:

6 EVAN PONTZ, Esq.
7

8 On behalf of Lexington Insurance Company:

9 ROBERT J. MASELEK, Esq.
10

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14		dated 8/23/95 signed by Harrison	
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16	2	WCW Deposits to Operating Account	
17		for the month of March 1997; 5/28/97	
18		Memo to Don Edwards from Joe	
19		Hamilton re: Payments to Power Plant;	
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19		MR. PONTZ: This will be the deposition of	
20		Harrison Norris taken in the group of cases filed against	
21		World Championship Wrestling, among which Mr. Norris is one	
22		of the plaintiffs. It's going to be taken for all purposes	
23		under the Federal Rules of Civil Procedure.	
24		Why don't we swear in Mr. Norris.	
25			

1 HARRISON NORRIS, JR.

2 having been first duly sworn, was deposed and testified as
3 follows:

4 EXAMINATION

5 BY MR. PONTZ:

6 Q. Good morning, Mr. Norris.

7 A. Good morning.

8 Q. My name is Evans Pontz. We met earlier this
9 morning. I'm going to be taking your deposition today.
10 Have you ever been deposed before?

11 A. No, sir.

12 Q. Okay. Let me tell you how this is going to go
13 just so you understand, and obviously your attorney is here,
14 so if we have any questions at any point we can all discuss
15 them.

16 But this is an opportunity to give your formal
17 testimony today in your lawsuit against World Championship
18 Wrestling and Turner Sports. Do you understand that?

19 A. Yes, sir.

20 Q. Okay.

21 MR. ICHTER: Actually, I disagree with that. This
22 is not his formal testimony. This is his discovery
23 deposition.

24 BY MR. PONTZ:

25 Q. Understood. But do you understand this is being

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1 taken and all the words that you say are being written down
2 and you're going to give what is and may be used as
3 testimony in this case; do you understand that?

4 A. Yes, sir.

5 Q. Okay. And this case concerns your claims of race
6 discrimination and other types of claims, right?

7 A. Yes, sir.

8 Q. Great. Now, you're already doing a good job of
9 this, but do remember that the court reporter is writing
10 down all the words that we say, so it's real important to
11 give yeses and nos and other audible words rather than head
12 shakes or "uh-huhs" and "huh-uhs", because they're real hard
13 for the court reporter.

14 A. Yes, sir.

15 Q. Is that okay?

16 A. Yes, sir.

17 Q. Great. And real important too, that you try to
18 let me finish my questions and I will try to let you finish
19 your answers so that we don't talk over each other, because
20 it makes the court reporter's job extra hard.

21 A. Yes, sir.

22 Q. Great. And you understand that you're giving your
23 testimony today under oath?

24 A. Yes, sir.

25 Q. And you've sworn to tell the truth?

1 A. Yes, sir.

2 Q. Great. Basically today is just going to be a
3 series of questions. I will ask you some questions and
4 you'll tell me the answers.

5 A. Yes, sir.

6 Q. Okay. Great. If you don't hear any part of a
7 question, will you let me know?

8 A. Yes, sir.

9 Q. Okay. And if you don't understand any of my
10 questions, will you also let me know that?

11 A. Yes, sir.

12 Q. Okay. So if you go ahead and answer my question,
13 I'm going to assume that you understood it and you heard it.

14 A. Yes, sir.

15 Q. Great. And if you need to take a break, get a
16 drink, take a break, whatever, just let me know.

17 A. Yes, sir.

18 Q. And we'll go ahead and we'll talk with your
19 lawyer, as well, and we'll take plenty of breaks, I'm sure,
20 during today.

21 A. Yes, sir.

22 Q. Great. There's one exception to that. We don't
23 take breaks in between my question and your answer.

24 A. Yes, sir.

25 Q. So if you need to take a break, you can go ahead

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1 and answer any question that's pending and then we'll go
2 ahead and take a break, okay?

3 A. Yes, sir.

4 Q. Great. Any questions before we begin?

5 A. No, sir.

6 Q. Great. Let me start by getting just some basic
7 information from you. Would you state your full name for
8 the record.

9 A. Yes, sir. My name is Harrison Norris, Jr.

10 Q. Okay. And what is your date of birth?

11 A. My date of birth of 2-5-66.

12 Q. Okay. And where did you grow up?

13 A. I grew up in Pensacola, Florida, sir.

14 Q. Okay. All your childhood life?

15 A. Yes, sir.

16 Q. Great. And your father's name, I assume, is
17 Harrison Norris --

18 A. Sr., sir.

19 Q. -- Sr.? Okay. And your mother's name?

20 A. Lucille Presley Norris, sir.

21 Q. Okay. And are they still living?

22 A. Yes, sir.

23 Q. Okay. Great. Where do they live?

24 A. Pensacola, Florida, sir.

25 Q. Where? In your childhood home, I take it?

1 A. Yes, sir.

2 Q. Okay. And what do they do for a living?

3 A. My father is a full-time mechanic and my mother,
4 she's a housewife.

5 Q. Do you have any brothers or sisters?

6 A. Yes, sir.

7 Q. How many brothers and sisters?

8 A. I have five brothers and one sister, sir.

9 Q. Wow, big family like me. So you're one of seven?

10 A. Yes, sir.

11 Q. That's exactly like me. Can you tell me, start
12 with maybe the oldest and tell me the oldest's name and an
13 approximate age, and if they have a different last name,
14 will you tell me their last name.

15 A. Yes, sir.

16 Q. Great.

17 A. My oldest brother is James Edward Norris.

18 Q. Okay. How old is he, roughly?

19 A. Roughly he's -- how old is James? I never met
20 James.

21 Q. Okay.

22 A. I'd say right now he's about 48, sir.

23 Q. Okay. And your next brother or sister?

24 A. Frederico.

25 Q. Norris?

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1 A. Yes, sir.

2 Q. And how old is Frederico?

3 A. Frederico, he was born in '61, so he'd be 41, sir.

4 Q. Okay. And next?

5 A. Michael.

6 Q. How old is Michael?

7 A. Michael born in '63.

8 Q. Okay. We can do the math later. But he was born

9 in 1963?

10 A. Yes, sir, born in '63.

11 Q. Michael Norris, as well?

12 A. Yes, sir.

13 Q. Okay. And then your next brother?

14 A. Broderick.

15 Q. Broderick Norris?

16 A. Yes, sir.

17 Q. How old is Broderick?

18 A. Born in '65.

19 Q. Okay. And then the next sibling?

20 A. Would be myself, sir, Harrison, Jr., sir.

21 Q. And then the next sibling would be?

22 A. Douglas Norris, sir.

23 Q. Douglas Norris?

24 A. Yes, sir.

25 Q. And what is Douglas's age?

1 A. Douglas is '72. He'll be --

2 Q. About 30?

3 A. Yes, sir.

4 Q. Okay. And then after that sibling?

5 A. My only sister is Dyshannon, sir.

6 Q. What's her first name?

7 A. Dyshannon.

8 Q. Okay. Can you spell that for me?

9 A. D-y-s-h-a-n-n-o-n.

10 Q. Great. And is she married?

11 A. Yes, she is, sir.

12 Q. Does she use a different last name?

13 A. No, she use Norris, sir.

14 Q. Do you know her husband's name?

15 A. No, sir.

16 Q. Okay. And she's how many years younger than you,
17 roughly?

18 A. She was born in '72, sir.

19 Q. Okay. Great. Do any of them live in the Atlanta
20 area or the Atlanta suburbs?

21 A. Yes, sir.

22 Q. Which ones?

23 A. Dyshannon and Douglas, sir.

24 Q. Where does Dyshannon live?

25 A. I have no idea, sir.

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1 Q. But you know she's somewhere in the Atlanta area?

2 A. Yes, sir.

3 Q. And Douglas?

4 A. In Atlanta area, sir.

5 Q. But not sure where?

6 A. Not sure where, sir.

7 Q. Do you know the town or the city or anything like
8 that?

9 A. No, sir.

10 Q. Okay. But they both go by Norris?

11 A. Yes, sir.

12 Q. Great. And do you have any children?

13 A. Yes, sir, I have three siblings, sir.

14 Q. Three children?

15 A. Three children.

16 Q. Okay. What are your children's names?

17 A. Rasean.

18 Q. How old is Rasean?

19 A. Fifteen, sir.

20 Q. Okay. And what's your next child's name?

21 A. Anastasia.

22 Q. And how old is Anastasia?

23 A. She's nine, sir.

24 Q. Nine. And your last child?

25 A. Sinjin, sir.

1 Q. Sinjin?

2 A. Yes, sir.

3 Q. How do you spell that?

4 A. S-i-n-j-i-n.

5 Q. Just like it sounds?

6 A. Yes, sir.

7 Q. Okay. How old is Sinjin?

8 A. He's one years old, sir.

9 Q. One year old. Congratulations, you have a
10 newborn, right?

11 A. Yes, sir.

12 Q. And do you have any other relatives that live in
13 the Atlanta area other than the brother and sister that you
14 mentioned?

15 A. No, sir.

16 Q. What's your current address and telephone number?

17 A. Current address, sir, is 332 Amber Ridge, and
18 that's Amber Ridge Drive, sir.

19 Q. Okay. And what part of Atlanta is that in?

20 A. That's in Cartersville, sir.

21 Q. Cartersville. What's the ZIP Code there?

22 A. 30121, sir.

23 Q. And the phone number there?

24 A. 678 938-4129, sir.

25 Q. And how long have you lived at that address?

Page 13

1 A. Since October, sir.

2 Q. Okay. Since October of 2001?

3 A. Yes, sir.

4 Q. Where did you live before this address?

5 A. 1028, sir, Plantation Way.

6 Q. And what part of Georgia was that in?

7 A. Kennesaw, sir.

8 Q. And how long were you at the Kennesaw address, the
9 1028 Plantation Way?

10 A. Five and a half years, sir.

11 Q. So that takes us to about '96, you think?

12 A. Yes, sir.

13 Q. Okay. Where were you before -- where were you
14 living in the Atlanta area before that?

15 A. I was actually in Decatur, sir.

16 Q. Okay. Do you remember the address in Decatur?

17 A. No, sir.

18 Q. Okay. How long were you in Decatur?

19 A. I don't remember, sir.

20 Q. You think a year or two, or more than that?

21 A. I don't remember. I'm not really time frame as
22 far as the time.

23 Q. Okay. I understand you were in Colorado.

24 A. Yes, sir, I was.

25 Q. Okay. Did you move from Colorado to Decatur?

1 A. Yes, sir, I did, sir.

2 Q. And you moved from Decatur to Kennesaw?

3 A. Yes, sir, I did.

4 Q. So other than when you were living in Colorado,
5 the only places you've lived in the Atlanta area were
6 Decatur and then Kennesaw and then Cartersville?

7 A. Yes, sir.

8 Q. Okay. Great. Do you remember when you moved from
9 Colorado to Atlanta?

10 A. Yes, sir.

11 Q. When was that?

12 A. That was in February, sir.

13 Q. Of what year? Do you recall?

14 A. '95, sir.

15 Q. Okay. Great. What is your Social Security
16 number, Mr. Norris?

17 A. 265-57-0393.

18 Q. Okay. And have you gone by any other name other
19 than Harrison Norris, Jr.?

20 A. No, sir.

21 Q. Other than Hardbody in the wrestling world?

22 A. That's it, sir.

23 Q. But you've never used any other name legally --

24 A. No, sir.

25 Q. -- on any documents or anything like that?

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1 A. No, sir.

2 Q. Okay. Great. Currently married?

3 A. Yes, sir.

4 Q. What's your wife's name?

5 A. Audrey.

6 Q. Audrey. Do you remember Audrey's maiden name?

7 A. Yes, I do, sir.

8 Q. What is that?

9 A. Kay, K-a-y.

10 Q. K-a-y. How long have you been married to Audrey?

11 A. Since '89, sir.

12 Q. And are all your children with Audrey?

13 A. No, sir.

14 Q. Which of your children are with Audrey?

15 A. My daughter, sir.

16 Q. Okay.

17 A. Anastasia.

18 Q. Anastasia. And can you tell me the mother's names

19 for your other two children?

20 A. Yes, I can, sir.

21 Q. Great. Go ahead and tell me which mother with

22 which child.

23 A. Okay. My son Rasean, his mother's name is Patina.

24 Q. Patina. Do you know her last name?

25 A. Rogerson.

1 Q. And do you know where she lives?

2 A. Yes, she live in Tallahassee. Excuse me, sir.
3 Crawfordville, Florida. She moved out of Tallahassee.

4 Q. Crawfordville. And Rasean lives with her?

5 A. Yes, sir.

6 Q. Okay. And then your other -- you had another
7 daughter, I think.

8 A. No, I have another son, sir.

9 Q. Another son. I'm sorry. What was your other
10 son's name?

11 A. Sinjin. Yeah, Sinjin.

12 Q. And Sinjin lives with his mother?

13 A. Yes.

14 Q. What's his mother's name?

15 A. His mother name is Terry Gutierrez, sir.

16 Q. Can you spell that name, the last name for me.

17 A. G-u-t-i-e-r-r-e-z.

18 Q. Okay. And where does Sinjin and Miss Gutierrez
19 live?

20 A. She live Michigan, sir.

21 Q. Michigan. Okay. And Audrey Kay, your wife
22 Audrey --

23 A. Yes, sir.

24 Q. -- is that the only marriage you've had?

25 A. Yes, sir.

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1 Q. Okay. Great. Mr. Norris, this is a question I
2 ask of everybody, so please take no offense to it, but have
3 you ever been convicted of a crime?

4 A. Yes, I have, sir.

5 Q. Okay. What crime have you been convicted of?

6 A. Pimping, sir.

7 Q. Okay. When was this?

8 A. 2001, sir. I don't remember actually month and
9 date.

10 Q. Do you remember what court this was in?

11 A. No, sir.

12 Q. Did you plead guilty?

13 A. No, sir.

14 Q. You were found guilty in a court of law?

15 A. No, sir.

16 Q. Okay. I asked you if you'd ever been convicted of
17 a crime.

18 A. No. I'm sorry. Can you rephrase that then?

19 Q. You were arrested for pimping?

20 A. Yes, sir.

21 Q. When was this? This was --

22 A. 2001, sir.

23 Q. Sometime last year?

24 A. Yes, sir, it was.

25 Q. Do you remember what season it was?

1 A. No, sir. I really don't, sir.

2 Q. Was it warm out or cold out or --

3 A. I don't remember, sir.

4 Q. Don't remember. Can you tell me about the
5 incident involving your arrest for pimping.

6 A. Yes, I can, sir. Basically went to -- there was a
7 bachelor party. You know, I was hired as security, you
8 know, to look out for the girls that had to go to the
9 bachelor party.

10 And one of the guys there, I guess he was being
11 followed, and I guess he was like a drug dealer or something
12 like that, and they followed me in and they bust him, and
13 what they did was is just took everybody in, so to speak.

14 Q. Do you remember what the charge specifically was?

15 A. For him, no, sir, I don't, sir.

16 Q. How about for yourself?

17 A. That's what my charge was.

18 Q. They charged you with --

19 A. Pimping.

20 Q. Okay. And did you go to trial on that charge?

21 A. No, sir, I didn't, sir.

22 Q. Okay. Do you remember how it was resolved or
23 whatever happened to it?

24 A. Actually, sir, I really don't remember the end
25 case of the outcome of it is, sir.

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1 Q. Did you --

2 MR. ICHTER: Evan, I think it's pending.

3 BY MR. PONTZ:

4 Q. Okay. Do you have a lawyer representing you in
5 that?

6 A. Yes, sir.

7 Q. Do you know that lawyer's name?

8 A. It would be Cary, sir.

9 Q. Okay. Mr. Ichter's representing you in that case?

10 A. Yes, sir.

11 Q. Great. Okay. Mr. Norris, where did you attend
12 high school?

13 A. Pensacola, Florida, sir.

14 Q. Okay. And what year did you graduate from high
15 school?

16 A. 1984, sir.

17 Q. Did you attend college?

18 A. No, sir.

19 Q. Okay. Did you go into the military straight from
20 college?

21 A. I never attend college, sir.

22 Q. Excuse me, from high school. Did you go into the
23 military from high school?

24 A. Yes, sir.

25 Q. Okay. How long were you in the military?

1 A. Ten and a half years, sir.

2 Q. Which branch of the service?

3 A. Army, sir.

4 Q. And when were you discharged from the army?

5 A. '94, sir.

6 Q. Honorably discharged, I take it?

7 A. Yes, sir.

8 Q. Okay. Other than high school education and things
9 you learned in the service in the army, have you taken on
10 any other formal education or anything like that?

11 A. I took some college, sir, while I was in the
12 military, I mean, some classes.

13 Q. Okay. Where did you take classes; do you recall?

14 A. Different universities. I mean, it was on the
15 base, University of Maryland, University of Chicago.

16 Q. Okay. Were you at different bases during your
17 career?

18 A. Yes, sir.

19 Q. How many different bases? Do you have any
20 recollection? I won't ask you to go through every one,
21 but --

22 A. I don't remember, sir.

23 Q. Are we talking about --

24 A. Quite a few.

25 Q. About one a year, you think, or less?

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1 A. Not sure. Not that often. I mean, most the time
2 you was stationed somewhere, you were stationed there for
3 two and a half to three years, sir.

4 Q. Okay. Great. So you took -- what kind of classes
5 did you take? Do you recall what they were in?

6 A. Yes, sir. Computers. I took some computers.
7 Main thing was computers. I wanted to take more things to
8 broaden my knowledge in the computer field, sir.

9 Q. Okay. And you never received any degree or
10 certificate or anything?

11 A. No, sir, no degrees.

12 Q. Okay. Just to learn more about computers?

13 A. Yes, sir.

14 Q. Okay. Great. Mr. Norris, other than this case
15 involving WCW and Turner Sports and the matter that you
16 mentioned earlier involving some criminal charge --

17 A. Yes, sir.

18 Q. -- in 2001, have you ever been involved in any
19 other litigation?

20 A. No, sir.

21 Q. Have you ever been involved in any other criminal
22 matter before?

23 A. No, sir.

24 Q. Have you ever sued anyone before?

25 A. No, sir.

1 Q. Have you been sued before?

2 A. No, sir.

3 Q. Okay. Have you ever been a witness in a lawsuit?

4 A. No, sir.

5 Q. Okay. Great. That makes my life easy. Have you
6 ever filed for personal bankruptcy before?

7 MR. ICHTER: You want to think about the one about
8 whether or not you've ever been sued before.

9 THE WITNESS: Been sued before? Oh, yes. Yes,
10 sir. What is this guy's name?

11 MR. ICHTER: I'm sure Mr. Pontz knows about it,
12 so --

13 THE WITNESS: Okay. WCW wanted -- I can't think
14 of his name right now. One guy sued the company at WCW. He
15 was a reporter. He came in. He came out to the wrestling
16 school, got in the ring, got his nose broken. I don't know
17 if his nose was broken or fractured, but he sued me and WCW.
18 BY MR. PONTZ:

19 Q. He sued you personally?

20 A. Yes, sir, he did, sir.

21 Q. And WCW?

22 A. Yes, sir.

23 Q. Do you know the status of that litigation
24 currently?

25 A. It's a done deal. My lawyer can fill you in on

Page 23

1 it, sir.

2 Q. Okay. Do you know the details of how it was
3 resolved?

4 A. Yes, sir. Well, he sued, sir.

5 Q. Okay. Do you know how it ended up? Are you aware
6 of that?

7 A. I don't know the legal terminology of it, sir, but
8 I'm pretty sure my lawyer can fill you in on it.

9 Q. Okay. And you believe it's over?

10 A. Yes, sir.

11 Q. Did you have to pay any money personally to this
12 gentleman that you're aware of?

13 A. Not that I'm aware of, sir.

14 Q. Okay. Great. I was asking you before -- and I
15 appreciate your candor with that. Have you ever filed for
16 bankruptcy?

17 A. No, sir.

18 Q. Has your wife ever filed for personal bankruptcy?

19 A. No, sir.

20 Q. Okay. And you don't have a corporation or
21 anything that's filed for bankruptcy, do you?

22 A. No, sir.

23 Q. Okay. Other than the EEOC charges that you filed
24 related to this case --

25 A. Yes, sir.

1 Q. -- you understand you filed some EEOC charges?

2 A. Yes, sir.

3 Q. And we'll talk about them a little bit later, but
4 other than those EEOC charges related to this case, have you
5 ever filed any other charge of discrimination with any
6 government agency or any other entity in your life before
7 this?

8 A. No, sir.

9 Q. Okay. And you've never brought charges of
10 discrimination against anyone other than the ones involved
11 in this case?

12 A. Yes, sir. This is the only one, sir.

13 Q. Okay. Nothing in the army or anything like that?

14 A. No, sir.

15 Q. Okay. Great. Let me talk you through a little
16 bit so I can make sure I understand some of your history
17 with WCW and your history as a wrestler.

18 A. Yes, sir.

19 Q. Okay. Now, it's my understanding that you first
20 came to WCW in -- was it August of 1995 for a tryout?

21 A. I'm trying to remember time frame, sir.

22 Q. Okay. When did you start training with WCW?

23 A. I started training with them '95, sir.

24 Q. Do you remember what month it was?

25 A. It was February, sir, yes, sir.

Page 25

1 Q. Okay. Is it possible that you started training in
2 February of '96?

3 A. February '96. I can recall the year, sir.

4 Q. Okay. Is it possible that you came to WCW in kind
5 of the August time frame of '95 for your tryout?

6 A. Yes, sir.

7 Q. And then came back in February of '96 to start
8 training with WCW? Does that fit with your recollection?

9 A. Yes, sir, it could be possible, sir.

10 Q. Okay. Let me show you, let me see if I can help
11 make sure that this recollection is as accurate as we can
12 get it.

13 (Marked Defendants' Exhibit No. 1.)

14 BY MR. PONTZ:

15 Q. Am Mr. Norris, let me hand you what's been marked
16 Defendants' Exhibit 1 and ask you to take a look at that
17 document. It's actually three pages stapled together.

18 A. Yes.

19 Q. Does that appear to be your signature at the
20 bottom of the first page?

21 A. Yes, sir, it is, sir.

22 Q. Okay. This seems to indicate that you came first
23 to WCW for a tryout in August of 1995.

24 A. Yes, sir.

25 Q. Does that sound about right?

1 A. Yes, sir.

2 Q. Do you remember paying a fee for that tryout?

3 A. Yes, sir, I do, sir.

4 Q. Is that a check that you remember providing to WCW
5 on the third page?

6 A. Yes, sir.

7 Q. Okay. Great. And that's amount \$250?

8 A. Yes, sir.

9 Q. Okay. Great. So you think -- does this help
10 refresh your recollection --

11 A. Yes, it does, sir.

12 Q. -- that perhaps your tryout with WCW was in August
13 of '95 and then you came in February of the next year to
14 start training?

15 A. Yes, sir.

16 Q. Okay. Great. What -- well, let me ask you this.
17 How did you first find out about WCW?

18 A. Actually, I had another wrestler that was -- used
19 to wrestle with WCW that was I guess living out in Colorado.
20 He pretty much filled me in on all the details.

21 Q. What was his name?

22 A. I don't recall his name, sir, at all.

23 Q. Okay. But he told you about WCW?

24 A. Yes, sir.

25 Q. What made you interested in wrestling with WCW?

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1 A. Well, sir, you know, every time I went in, he kept
2 bugging me about it. He just kept, why don't you be a
3 wrestler, why don't you be a wrestler.

4 Q. Did you see him all the time in Colorado or
5 something?

6 A. Yes, sir, I did, sir.

7 Q. Working out or --

8 A. Yes, sir. I'd seen him at the -- he worked at the
9 health food store, sir.

10 Q. Is that where you were working at the time?

11 A. No, sir. Actually, I was buying all my
12 supplements from the health food store, sir.

13 Q. Okay. And so he encouraged you to seek out WCW?

14 A. Yes, sir.

15 Q. Okay. And so you did?

16 A. Yes, sir, I did, sir.

17 Q. How did you find out about the tryout opportunity?

18 A. Actually, sir, he actually made some phone calls
19 for me, sir.

20 Q. Okay. And you don't remember his name at all?

21 A. No, sir.

22 Q. Okay. So you went down and had a tryout in August
23 of '95?

24 A. Yes, sir.

25 Q. Went well?

1 A. Yes, sir, it did, sir.

2 Q. Okay. And you understood when you went down not
3 everybody makes it through the tryout, right?

4 A. Yes, sir, I understood.

5 Q. But you did?

6 A. Yes, sir.

7 Q. Was it pretty tough?

8 A. Yes, sir, it was.

9 Q. Okay. And then after the tryout you were invited
10 to come back and do a training program with WCW?

11 A. Yes, sir, I was, sir.

12 Q. And you started that in February?

13 A. Yes, sir.

14 Q. Okay. Do you know who made the decision to invite
15 you back to do training at WCW?

16 A. Yes, sir, I do, sir.

17 Q. Who was that?

18 A. All the instructors, Mr. Jody Hamilton, sir.

19 Q. Do you remember who the other instructors were?

20 A. Yes, sir.

21 Q. Who were they?

22 A. Mike Wenner.

23 Q. Okay. Who else?

24 A. Pez Whatley.

25 Q. Okay.

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1 A. Dwayne Bruce.

2 Q. Anybody else?

3 A. No, sir.

4 Q. Okay. It's your understanding that they were
5 involved in the decision to bring you back to train?

6 A. Yes, sir.

7 Q. Okay. How do you know that they were involved?

8 A. They called us in the office, sir, and they do the
9 evaluation right there on the spot, after the third day of
10 training, sir.

11 Q. So all those gentlemen were there?

12 A. Yes, sir.

13 Q. And they said we'd like you to come back and go
14 through the training program?

15 A. Yes, sir.

16 Q. Okay. Did they tell you the cost of the training
17 program?

18 A. Yes, sir, they did, sir.

19 Q. How much was it; do you recall?

20 A. Yes, sir, it was about \$3400, sir.

21 Q. And you decided to come back and do that in
22 February?

23 A. Yes, sir.

24 Q. Now, you didn't have to pay that whole amount of
25 money up front, did you?

1 A. Sir, what they did was they actually, for the guys
2 that could afford to pay up front, they asked for it up
3 front. If not, they did what you call like a payment plan
4 type deal.

5 Q. Okay. And you did the payment plan deal?

6 A. Yes, sir.

7 Q. Do you remember how long it took you to pay all
8 the money off?

9 A. No, sir, I don't, sir.

10 Q. Did you in fact pay all the money off, do you
11 think?

12 A. Yes, sir.

13 Q. Do you think it took you a couple years to do it?

14 A. I don't recall, sir.

15 MR. PONTZ: Okay. Let me see if I can help you a
16 little bit. Mark this as Defendants' 2.

17 (Marked Defendants' Exhibit No. 2.)

18 BY MR. PONTZ:

19 Q. Mr. Norris, you've been handed a group of
20 documents marked Defendants' Exhibit 2. If you'll take a
21 look at them through them with me, it appears that on the
22 first page it indicates that you made a payment of \$500 in
23 March of 1997. On the very first page you can see near
24 across the top.

25 And then on the second page -- well, let's go back

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1 to the first page. Do you see where it says that Harrison
2 Norris made a \$500 payment for the training program on March
3 of '97 on the first page?

4 A. Yes, I see it, sir.

5 Q. Okay. Does that sound like it was correct? Do
6 you remember that?

7 A. Yes, sir.

8 Q. And then on the next page there's a little note
9 that indicates that you paid \$400 in June of 1997 -- or
10 excuse me, in May of 1997, and that that left you with a
11 balance of about \$800. Does that sound correct to you?

12 A. I don't recall, sir, at all.

13 Q. You're not sure. How about on the next page
14 there, it looks like a check for \$400 dated May 23rd, 1997.
15 Does that appear to be a check that you wrote to WCW?

16 A. Yes, sir, it is, sir.

17 Q. Okay. Question for you. On that check there's an
18 address of 3006 Delmar Lane. Did you live at that address?

19 A. 3000 Delmar Lane? Actually, no, sir, I didn't,
20 sir.

21 Q. Okay. Any idea why that was an address on a check
22 that you used?

23 A. Well, I think then what happened was they had a
24 couple other wrestler I think living at that place and they
25 wanted me to come in and be their roommate, and I wouldn't

1 do it because, once again, I didn't like the area they were
2 living in.

3 Q. Okay. Any idea why you went and got a checking
4 account with that address on the checks if you didn't move
5 in there?

6 A. Like I said, sir, the only thing I remember, they
7 wanted me to move in there and that's the address that I,
8 you know, I gave the bank. I didn't have address. I was in
9 transit at the time, sir.

10 Q. Okay. But you didn't ever live at that address?

11 A. 300 Delmar Lane? I'm trying to remember where
12 that's located at.

13 Q. Doesn't ring a bell to you?

14 A. I'm trying to remember. I don't really recall.

15 Q. Okay.

16 A. I'm trying to remember.

17 Q. But it looks like you did pay WCW another \$400 in
18 May of 1997, right?

19 A. Yes, sir.

20 Q. Based on that check?

21 A. On this check, sir.

22 Q. Okay. And then on the very last page of this
23 group, it looks like in October of 1997 you wrote another
24 check to WCW Power Plant for \$200. Is that your
25 recollection?

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1 A. Yes, sir.

2 Q. Okay. Great. Do you ever remember receiving
3 anything from WCW indicating that you had paid the full
4 amount for your training fee?

5 A. From Mr. Hamilton, Jody Hamilton, sir.

6 Q. He gave you something that said that or did he
7 just tell you that?

8 A. He told me also, sir.

9 Q. Told you that you were all paid off?

10 A. Yes, sir.

11 Q. Okay. Great. Super. Mr. Norris, I take it that
12 when you came to WCW and paid to train as a wrestler, this
13 was the first time you had ever paid for any kind of
14 training or teaching or things like this, other than maybe
15 the college computer classes; is that right?

16 A. No, sir.

17 Q. What had you previously paid for in terms of a
18 learning opportunity or something like that?

19 A. Football, sports, sporting events, sir.

20 Q. Is this as a child or as an adult?

21 A. Well, the football, I did some stuff in the
22 military, you know, semi pro, but it required you to pay so
23 much money up front to be able to play on the team.

24 Q. Okay. These are semi pro teams?

25 A. Yes, sir.

1 Q. Do you remember how much you paid for these
2 opportunities, roughly?

3 A. No, sir.

4 Q. So a few dollars or a lot of money?

5 A. I don't remember, sir, at all.

6 Q. Anything in the neighborhood of 3,000 or more?

7 A. I don't remember at all, sir. Like I say, it was
8 semi pro.

9 Q. Okay. Where did you play semi pro football?

10 A. I played in Europe, sir, Germany.

11 Q. And this was while you were in the military?

12 A. Yes, sir.

13 Q. Were you stationed in Europe at the time?

14 A. Yes, I was, sir.

15 Q. Which part of Europe?

16 A. The southern part of Europe, sir.

17 Q. Do you remember which country you were in?

18 A. Germany, sir.

19 Q. Okay. And were you paid to play semi pro
20 football?

21 A. No, sir.

22 Q. So you paid them for the chance to play?

23 A. Correct, sir.

24 Q. Okay. So you started your training session in
25 February of '96 with WCW?

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1 A. Training session, yes, sir.

2 Q. Okay. And you understood it was a six-month
3 training session, training program?

4 A. Yes, sir. The training school is what you're
5 referring to, correct?

6 Q. At the Power Plant.

7 A. Yes, sir.

8 Q. Okay. And after the six months or so had passed,
9 you started wrestling with WCW on occasion?

10 A. No, sir, not right then, sir.

11 Q. Okay. How long after the six months had passed do
12 you recall first starting?

13 A. I really can't recall, sir, because I was there
14 for a while and I really didn't understand what was going
15 on. I asked a lot of questions as far as, you know, what's
16 next, you know, after six months, you know.

17 Q. Okay. Who did you ask questions of?

18 A. I asked the instructors, sir, and asked Mr. Terry
19 Taylor and I asked Mr. JJ Dillon, sir.

20 Q. Okay. What did those gentlemen tell you what was
21 next?

22 A. Everybody sent me to another guy. I was getting
23 the runaround, sir.

24 Q. Okay. So no one told you one way or the other
25 what was next?

1 A. No, sir, but I was just there in limbo. I didn't
2 know.

3 Q. Okay. Were the other guys at the Power Plant just
4 training, as well?

5 A. At the time, sir, I think I was the only guy that
6 six-month mark, maybe one other guy probably was at the
7 six-month mark also, sir.

8 Q. Who was that other guy?

9 A. I want to say his name Luther Biggs, sir.

10 Q. Okay. What do you remember about Mr. Biggs?

11 A. Other than the fact that he was at, you know, the
12 Power Plant, you know, certain days he showed up, certain
13 days he didn't, you know, sir.

14 Q. What did he look like?

15 A. Just big guy.

16 Q. White or not white?

17 A. He's a white guy, sir.

18 Q. White guy?

19 A. Yes, sir.

20 Q. And no one at the time promised you any certain
21 amount of matches or anything like that, right?

22 A. No, sir.

23 Q. No one ever promised they'd make you a super star
24 or anything like that, right?

25 A. No, sir.

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1 Q. But you kept coming to the Power Plant?

2 A. I was told, yes, sir.

3 Q. You were told what?

4 A. To be at the Power Plant, sir.

5 Q. Who told you that?

6 A. The instructors, sir.

7 Q. So they could continue working and you could
8 continue working out; is that why you were told to be there?

9 A. Yes, sir. That and also at the Power Plant I
10 helped train a lot of other guys that came through the Power
11 Plant, sir.

12 Q. Okay. Taught them some of the things you had
13 learned?

14 A. Yes, sir.

15 Q. Did anybody ask you to do that or did you --

16 A. Yes, sir, the instructor, sir.

17 Q. Asked you to help out?

18 A. Yes, sir.

19 Q. Did you get paid for that?

20 A. No, sir.

21 Q. Did you ask anybody to get paid for that?

22 A. Yes, sir.

23 Q. Who did you ask to get paid?

24 A. The instructor, sir, and also Terry Taylor and JJ
25 Dillon, sir.

1 Q. What did they say when you asked to get paid for
2 that?

3 A. Once again, I don't remember, sir.

4 Q. Well, did you ever sit down and say look, I'm not
5 going to do this unless you guys pay me?

6 A. Yes, sir, I did.

7 Q. Who did you say that to?

8 A. Actually, I scheduled two meetings to meet with
9 Mr. Bischoff, Eric Bischoff, and I never actually got a
10 chance to meet with him because I was kind of like shot down
11 or shielded to somebody else, sir.

12 Q. Okay. Well, who did you meet with to discuss
13 whether you were getting paid or not?

14 A. Terry Taylor, sir, and JJ Dillon, sir.

15 Q. And what did they tell you about whether you were
16 going to get paid to train?

17 A. Well, actually, once again, I was like getting the
18 runaround and actually, like, well, we're working this out
19 for the guys at the Power Plant or we're going to do this,
20 you know, or with you guys or just hold on, this is going to
21 happen and so forth, and time kept stacking up and I was
22 trying to be patient is what I was trying to be, sir.

23 Q. So you were continuing to come to the Power Plant
24 to work out and train yourself, and while you were there you
25 helped assist with other people learning what you'd learned?

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1 A. No, sir, I was told to be there.

2 Q. Okay. You were told to be there doing what?

3 A. Power Plant as far as training, keeping myself,
4 first of all, in shape and then helping the other guys, the
5 new guys that would come in, because new guys would come in
6 every month, sir.

7 Q. Okay. So you were told to be there to keep
8 yourself in shape, in part, so that if there was a wrestling
9 opportunity, you'd be ready, right?

10 A. No, sir. I was told to be there to train, first
11 of all, sir, and I also was told to be there to help the new
12 guys that didn't know how to do the maneuvers and the
13 maneuvers in the rings to help train them.

14 Q. Okay. When was this that you were told this?

15 A. Right at my six-month time, sir.

16 Q. Okay. So after the six months had passed?

17 A. I'm still at the training center, sir.

18 Q. Okay. After you didn't get paid for doing this,
19 why did you keep doing it?

20 A. Why did I keep doing it? I figured everybody was
21 telling you, like you have to pay your dues, sir. You know,
22 you have to be around. You're just the new kid on the
23 block. You know, Russia wasn't built in one day. That kind
24 of, you know, old slogan people would tell you. You know,
25 it's going to happen. You've just got to be patient, and so

1 I was trying to be patient, sir.

2 Q. Okay. So you thought it was a good opportunity or
3 a good thing to do for your future career to go ahead and
4 stay around and keep working out?

5 A. Well, not that I felt that was a good thing. I
6 was told to stay around, you know. Everybody I talked to,
7 well, we like your work, you know, you have a good work
8 ethic, good attitude, so, you know, we can do something with
9 you, so to speak.

10 Q. And this was the trainers and Jody Hamilton?

11 A. Well, not just, you know, the trainer, you know,
12 like when I talked to the bookers, like Terry Taylor, he was
13 one of the bookers, or Kevin Sullivan, Arn Anderson, Jimmy
14 Hart, JJ Dillon, them guys, it was like, well, you know, we
15 can do something with this kid or we're going to do this or
16 do that.

17 Q. Okay. And this was all around this time frame
18 right after your six months had finished up?

19 A. Yes, sir.

20 Q. Okay. So you kept coming to the Power Plant?

21 A. Yes, sir.

22 Q. Okay. At the time did you feel like you should be
23 getting paid for that time?

24 A. Yes, I did, sir.

25 Q. Okay. And you said that to people?

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1. A. Yes, sir.

2. Q. Okay. And they didn't say they'd pay you?

3. A. They'd brush me off, sir.

4. Q. Okay. How often were you coming to the Power
5 Plant back in -- I assume this is -- are we in agreement
6 this is kind of the end of 1996 period and into 1997? Did
7 that continue into 1997?

8. A. Yes, sir.

9. Q. Okay. How often were you coming to the Power
10 Plant?

11. A. Every day, sir. I mean, five days a week when I
12 say every day, sir.

13. Q. Okay. And how -- what time would you get there?
14 It would vary different times different days or --

15. A. No, sir. Usually I was the first one there and
16 last one to leave, sir.

17. Q. Okay. What time did you get there?

18. A. Usually between 8:30 and 9:00 before the Power
19 Plant open up. Most the time when I got there I would beat
20 Miss Woods there. She was the secretary that opened the
21 door most the time.

22. Q. What was her name?

23. A. Miss Woods, Brenda Woods.

24. Q. Okay. And what time did you stay till?

25. A. Usually when the Power Plant close, usually I

1 would stay and be one of the last guys to leave.

2 Q. Do you remember what time that was it would close?

3 A. Between 4:30, 5:00 o'clock, sir.

4 Q. Okay. Can you tell me what you did during the
5 course of a regular, normal day at the Power Plant during
6 this time period?

7 A. Yes, sir.

8 Q. Tell me what you did.

9 A. As far as training, sir?

10 Q. Start with the beginning when you got there 8:30,
11 9:00 o'clock, once you got in, what was the first thing you
12 did or what would you normally do?

13 A. First thing we did when we got in, sir, it would
14 all depend on what instructor came in, what mood they was
15 in. If the place was, you know, in shambles, the first
16 thing they made us do was clean up, swept floors, clean out
17 rings, tighten rings up, adjust rings.

18 Or if they was coming back from a road trip or
19 something like that, we had to offload the rings or
20 something like that, set it back up. We did that. If they
21 had pay-per-views and stuff going out, they needed something
22 loaded like a ring, then they'll make them load the ring.

23 Q. Okay. And when you say "we", this was you and
24 some of the other trainees and folks?

25 A. Whoever was there. I was there daily, so, I mean,

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1 I never missed out.

2 Q. So whoever was around would help out clean up or
3 help out load up?

4 A. No, not everybody helped out cleaning up, sir.

5 Q. Who didn't help out cleaning up?

6 A. Well, some of the guys skated out of it, you know,
7 guys were smart. I mean, some guys got smart. I guess I
8 was just the stupid one, sir. I was there every day.

9 Q. So in other words, they asked, hey guys, help us
10 out and you were one of the guys?

11 A. No, sir. They didn't ask. They told us.

12 Q. They said help us out?

13 A. No. They pretty much demanded like, well, you
14 know, you guys stop -- we was in the ring. They would stop
15 us, say, okay, get out of the ring, we've got to take a ring
16 off or load a ring up and we've got such and such
17 pay-per-view this weekend. That always took precedent over
18 any other training at the school, which I never understood.

19 Q. And a few guys wouldn't help, but everybody else
20 did?

21 A. No, not that everybody else did. Like I said,
22 putting it bluntly, definitely the racism started coming in
23 and I started noticing. Certain white guys wouldn't help at
24 all. It was like they was too good to break down a ring and
25 load.

1 Q. Who didn't help out?

2 A. Well, like Robbie Rage, Kenny Kaos. You know, I
3 mean, when they first got there they was, you know, gung-ho
4 guy, but after they got their contract and their salaries,
5 then it's kind of like, we're too good to do this kind of
6 stuff now.

7 Q. Okay. Who -- do you remember anybody else who
8 didn't help out?

9 A. A guy, you know, I mean, just typical guys, I
10 mean.

11 Q. Can you remember any other individuals who didn't
12 help out?

13 A. I would say 99.5 percent of the white guys.

14 Q. Okay. Some of the white guys did help out but
15 most --

16 A. Well, some of them did help out. I mean, the new
17 recruits that came in, like if they'd only been there at the
18 school 30 days, they helped out because they didn't know,
19 but as they got smarter, four or five months down the line,
20 they're like, I'll just take lunch at this time.

21 I know after lunch they're going to come in the
22 ring so I wanted to be here, and they'll come back after the
23 ring is already unloaded and so forth.

24 I mean, I wasn't a rich guy. Most the time I
25 stayed there and ate lunch at the Power Plant or ate off the

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1 little -- we call it little gut wagon that came around and
2 stuff like that, so, you know, and starting to do them kind
3 of chores for the school.

4 Q. Okay. Do you know if any of the wrestlers who
5 didn't help out ever, you know, got in trouble for not
6 helping out?

7 A. They never got in trouble for not helping out.

8 Q. As far as you know?

9 A. As far as I know, I mean, I seen it. I was there
10 every day.

11 Q. Okay. Well, you don't know what happened when you
12 weren't around?

13 A. I was always around, though.

14 Q. Okay. But something might have happened later,
15 maybe a wrestler didn't get an opportunity because they
16 weren't pitching in or helping out? Do you know whether
17 that happened or not?

18 A. It didn't happen because, like I said, I seen too
19 many guys that didn't help out, white wrestlers when I say
20 this, that didn't help out at all and they still got the
21 opportunity and they still got contracts.

22 Q. Okay. Were there any African-American wrestlers
23 who didn't help out?

24 A. No, there wasn't.

25 Q. Okay. All of them helped out?

1 A. All of them helped out.

2 Q. Who all was there that you remember helping out
3 that was African-American?

4 A. Me, myself, Willie Worthen, Tony Carr, Joe
5 Watkins, you know, them guys, Elix Skipper, all them guys
6 helped out.

7 Q. Okay. Anybody else you can remember who was
8 helping out?

9 A. You know, guys like Marshall Davis, you know, guys
10 like that, yes. Daron Easterling. Them guys, you know,
11 they're always there and they put forth the effort to help
12 out.

13 Q. Okay. Now, when you're talking about all these
14 guys, you're talking over very different time periods,
15 right?

16 A. I'm talking the whole time frame I've been at WCW.

17 Q. Well, those guys weren't all there the whole time
18 frame you were at WCW?

19 A. No, sir.

20 Q. They all came at various times?

21 A. Different times.

22 Q. Okay. That's fine. I just wanted to make sure I
23 understand that. And there were some white guys who helped
24 out at various times?

25 A. Yeah, sure. Some guys, you know, just really had

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1 a really good, you know, attitude about it, but like certain
2 ones that, you know, just weren't going to do it, weren't
3 going to do it.

4 Q. Did you ever say to any of the trainers or anybody
5 else you weren't going to help out?

6 A. No, sir.

7 Q. Did any of the African-American wrestlers who were
8 there with you ever say they weren't going to help out?

9 A. No, sir.

10 Q. So you'd come in, you said, in the morning and
11 you'd help fix the place up if it was a mess or help load
12 things or things like that. What else did you do during a
13 normal day at the Power Plant?

14 A. We'd train, sir.

15 Q. So you'd get in -- did you stretch out first, I
16 assume?

17 A. Yes, sir.

18 Q. Do some workout, calisthenics, weight lifting,
19 that kind of thing?

20 A. We come in, we stretch out. You know, we do the
21 training regiment the school we had, you know, employed for
22 us. Everybody was required to do that.

23 But once again, when the racism came in again
24 because everybody didn't participate. I mean, you know, if
25 I get to school at 9:00 o'clock and, you know, we clean for

1 an hour or up until 10:00, we do our stretching or working
2 out 11:00, then you might have somebody, we call them prima
3 donnas, early guys that ain't stars yet but think they're
4 stars, walk in at 2:00 o'clock, did an hour, you know,
5 routine and walk right out the door.

6 If that would happen to me, I probably would have
7 never been, you know, invited back to the school or
8 something like that.

9 Q. But you never tried that, right?

10 A. No, sir, I never did that.

11 Q. You never wanted to find out what would happen to
12 you if you --

13 A. No, sir.

14 Q. Okay. You say you started to believe that it was
15 racism. Is that because the prima donnas you described, the
16 only prima donnas you saw were white wrestlers?

17 A. No, sir, I don't believe it was racism because of
18 that because I asked about it. I asked some of the
19 instructor, why this guy ain't got to help out or why this
20 guy never participate or why every time we're doing a
21 detail, this guy is never on it.

22 Q. And who did you ask that to?

23 A. I asked the instructors that.

24 Q. And what did they say?

25 A. Well, you know, it's pretty much mind your own

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1 business.

2 Q. Okay. So they didn't really tell you why that was
3 or wasn't?

4 A. No, sir, they didn't.

5 Q. And so you started to believe that it had to do
6 with race?

7 A. I was smart enough to leave well enough alone.

8 Q. Okay. But no one ever said it's because that
9 guy's white and you're not?

10 A. Excuse me, sir?

11 Q. No one ever said, well, the reason that guy
12 doesn't have to help out is because he's white?

13 A. No, sir.

14 Q. You just started to assume that because of what
15 you saw?

16 A. I wasn't assuming. I was just going by the
17 picture that was painted there, sir.

18 Q. Okay. So you saw the race of yourself and the
19 race of other people and you came to believe that that was
20 discrimination?

21 A. No, sir. What I believe was at 5:00 o'clock when
22 they say okay, tomorrow morning training start at
23 9:00 o'clock, I expect everybody to be at 9:00 o'clock. I
24 don't expect, you know, seven other white guys to walk in
25 and start their training at 12:00 o'clock when we was told

1 to be there at 9:00 o'clock and nothing happened as far as
2 discipline measures.

3 Q. As far as you know?

4 A. No, as far as I'd seen, sir.

5 Q. You never saw any evidence of discipline?

6 A. Well, we never seen any discipline, sir.

7 Q. Okay.

8 A. There's no history of it, sir, what I'm saying.

9 Q. Okay. Any of the African-American employees ever
10 decide to come in late -- or excuse me -- any of the
11 African-American wrestlers ever decide to come in late?

12 A. Yes, sir.

13 Q. And anything happen to them when they did?

14 A. Yes, sir.

15 Q. What happened to them?

16 A. Actually, they weren't really invited to come back
17 to the school. They were pretty much weeded out, sir.

18 Q. Who was this?

19 A. Guys like Joe Watkins, Daron Easterling, Marshall
20 Davis, you know, guys like that, they was just weeded out.

21 Q. Okay. Do you know if Mr. Davis was signed to a
22 contract in fact to train?

23 A. Excuse me, sir?

24 Q. Was Mr. Davis signed to a contract to be a
25 trainee?

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1 A. I don't know, sir.

2 Q. Okay.

3 A. I don't know at the time, sir.

4 Q. You don't why he was let go, do you?

5 A. No, sir, I don't.

6 Q. Okay. And Mr. Watkins and Mr. Easterling you
7 believe were weeded out because they didn't attend regularly
8 or didn't come on time?

9 A. I don't know, sir. I mean, I wasn't told and I
10 really didn't, you know, dig them guys up and say, hey, why
11 you're not here or, you know.

12 Q. But you did see them not being here when they
13 needed to be in what you thought they were supposed to be
14 there?

15 A. Well, I just seen, you know, maybe once or twice a
16 guy was late or something like that, but it was treated
17 totally different, sir, what I'm saying. I mean, they
18 weren't trying to skip out on the workout.

19 I mean, for crying out loud, half the guys, you
20 know, we had jobs, you know, things of that nature trying to
21 make ends meet and pay the school, show up for school and do
22 the training. And if they let, you know, one instructor
23 know the day before that, hey, I might be a little late
24 because I do have a job, that sort of thing.

25 Q. You don't know if any white wrestlers were ever

1 weeded out, to use your words, because they didn't show up
2 or didn't come when they were supposed to do?

3 A. No, sir.

4 Q. You mentioned other jobs. Did you have other jobs
5 while you were training at the Power Plant?

6 A. No, sir.

7 Q. Never?

8 A. Yes, sir, actually, I ran my own wrestling and
9 boxing company about it, sir.

10 Q. Okay. When was this?

11 A. Time frame. I can't recall the time frame, but,
12 you know --

13 Q. About how long -- let's -- let me see if we can
14 put some dates and maybe will help you. I think we've
15 already discussed that you started your training program
16 with WCW in February of '96.

17 A. Yes, sir.

18 Q. So for the first six months you were a trainee
19 there. Were you running this wrestling and boxing company
20 during that first six months?

21 A. I can't recall, sir.

22 Q. Okay. And you left WCW, am I correct, at the --
23 near the end of 1999; is that your memory?

24 A. Yes, sir.

25 Q. Okay. Can you tell me kind of how far into, if

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1 you remember, that time frame that you believe you started
2 getting involved in the boxing and wrestling company?

3 A. I was already involved in the boxing. I was doing
4 the boxing before I was doing the wrestling.

5 Q. Okay. So that was something you had done before
6 you came to WCW?

7 A. Yes, sir.

8 Q. And it was something during the course of your
9 time there you kept doing?

10 A. I kept doing it, sir, because it got to the point
11 after six months, I mean, my sponsor I had, what's going on
12 with you down here, you know. I mean, you know, are you
13 just using our money living down in Georgia or are you
14 really going to get a job with these guys.

15 Q. Who was your sponsor?

16 A. Well, I had different, you know -- I got them on
17 my flyer. Different sponsors go out and they donate so much
18 money to help pay for the school and so forth.

19 Q. Okay. Who were some of the sponsors that donated
20 money to you?

21 A. In Colorado I would say Ron and Cheryl Bean.

22 Q. Okay. Do you know how much money they donated to
23 sponsor you?

24 A. Anywhere between 15 to \$20,000.

25 Q. Okay. Were they friends of yours or business

1 associates?

2 A. They were actually friends of mine. Ron, I met
3 him, you know, on a business deal and then through him, you
4 know, I met his wife and, you know, they, you know, became
5 sponsors of mine because they believed in me.

6 Q. Was this just a gift to you or was there some
7 obligation to pay it back?

8 A. No, pay it back, sir.

9 Q. Did you have to pay it back?

10 A. I'm still paying it back, sir.

11 Q. Okay. How much left do you have to pay back?

12 A. I don't recollect right now, sir.

13 Q. Okay. Did you actually sign any formal papers for
14 the money or was it just an agreement between you and Ron
15 and Cheryl Bean --

16 A. It was an agreement, sir.

17 Q. Nothing in writing?

18 A. No, sir.

19 Q. Okay. Who else sponsored you, gave you money?

20 A. Well, all the places, like small places, like a
21 tire company back in Colorado. They's no longer there so, I
22 mean, I don't know where of reaching them.

23 Q. How much did they give you; do you recall?

24 A. They actually sent me a couple hundred dollars a
25 month, they helped me out, sir.

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1 Q. And that was to help you with living expenses and
2 things like that, you think?

3 A. Well, yes, sir.

4 Q. Anybody else that you can think of?

5 A. That's the main two, sir.

6 Q. Okay. If you think of any else during the course
7 of the day, if you'll let me know that you remember somebody
8 else, I'd appreciate it.

9 A. Yes, sir.

10 Q. Okay. All right. So let me make sure I've
11 covered this. But when you were at the Power Plant, you did
12 some help with unloading and loading rings when that was
13 needed, right?

14 A. Yes, sir.

15 Q. How long would it take you generally, if a truck
16 came in with a ring that needed to be unloaded, how long
17 would that effort take you, you think?

18 A. It all depends on how many bodies you've got
19 available to move a ring. The WCW got some really heavy
20 rings, sir.

21 Q. Okay. Sometimes take an hour or two?

22 A. If we had to set it up, it would take about an
23 hour. If we had to take it off the truck and set it up, it
24 would take about an hour.

25 Q. And if it was just taking off, it would be a few

1 minutes?

2 A. Yes, sir, it would take, I would say, about 30
3 minutes if we were just taking it off to stack it wherever
4 they wanted, sir.

5 Q. Okay. And how about breaking a ring down and
6 putting it in the truck, about the same amount of time?

7 A. About -- a little longer, sir. About -- I'd say
8 about 20 minutes longer, sir.

9 Q. Okay. And the cleanup time that you did cleanup
10 around the Power Plant, was that half hour cleanup, you
11 think?

12 A. Depended on how many people were participating,
13 once again, sir.

14 Q. Sometimes a few minutes more, sometimes a few
15 minutes less?

16 A. Yes, sir. I mean, with more guys it's easier to
17 do because it's a big building.

18 Q. Sure. Were the ring break-ups and tear-downs an
19 everyday occurrence or less than everyday occurrence?

20 A. The cleanup was every day, sir. The ring
21 breakdown would depend on what the company had going on. If
22 the company had a pay-per-view and three house shows that
23 week and Thursday Thunder and a Monday Nitro, then, you
24 know, we might have to break down, you know, three or four
25 rings.

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1 Q. During the week?

2 A. During the week, sir.

3 Q. And then some weeks there would be few, if any,
4 breakdowns are put up?

5 A. Every week we was doing something, sir.

6 Q. Okay. So you think there was usually one or two a
7 week and sometimes more?

8 A. Yes, sir, more sometimes.

9 Q. Okay. And then the rest of your time when you
10 weren't cleaning up or breaking down the rings or putting up
11 the rings or helping move stuff in and out, you were -- is
12 it correct to say you were working out and in the ring
13 wrestling or doing calisthenics or workouts or other things
14 to help you as a wrestler?

15 A. Yes, sir.

16 Q. Okay.

17 MR. ICHTER: Are we talking -- with respect to
18 that question, are we talking about on a typical day or are
19 you now asking him about the entire universe of things he
20 ever did?

21 BY MR. PONTZ:

22 Q. Well, Mr. Norris, we're still talking about a
23 typical day.

24 A. Okay, sir.

25 Q. Obviously there would be days that would be

1 unique. I assume there would be some days where you did one
2 thing the whole day for a unique purpose, but on a normal,
3 typical day most of your days at the Power Plant is the day
4 you described the activities an accurate reflection of what
5 that day was like, a normal day?

6 A. Yes, sir.

7 Q. Most days involved some efforts at cleanup, and
8 then some days involved moving or setting up or breaking
9 down rings?

10 A. Yes.

11 Q. And most days revolved a major portion of the day
12 spent either in the ring or working out, lifting weights and
13 training?

14 A. Yes, sir.

15 Q. Is that accurate?

16 A. Well, most of the guys had gym membership to other
17 gyms. I mean, they had weights there.

18 Q. Right.

19 A. But most guys had memberships to other gyms to go
20 train at, so, you know, we didn't get to lift weights down
21 at the Power Plant as much as a lot of people think we did.
22 Most of the working out with the weights was at your own
23 gymnasium.

24 Q. Did you have a gym membership like that?

25 A. No, sir, I didn't.

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1 Q. So you did all your working out at the Power
2 Plant?

3 A. Yes, sir.

4 Q. Okay. So you utilized their workout facilities to
5 do your workouts?

6 A. Yes, sir.

7 Q. Okay. And did you take a lunch break every day?

8 A. Yes, sir, we did, sir.

9 Q. How long was your lunch break?

10 A. It varies. Once again, if the instructor was hot,
11 you know, they might give you 20 minutes. They might give
12 you 30 minutes, you know.

13 Q. Did you take a few other breaks, short breaks
14 during the day or --

15 A. They give you water breaks, sir, yes, sir.

16 Q. Okay. How long were those water breaks usually?

17 A. I would say anywhere between ten and 20 minutes,
18 sir.

19 Q. Okay. Two, three a day usually?

20 A. I'd say maybe two a day, sir.

21 Q. Like a midmorning and a midafternoon?

22 A. Yes, sir.

23 Q. Okay. Great. All right. In '96, '97, that kind
24 of time frame, maybe, you know, into later '96 or early
25 1997, do you recall roughly how many people were training at

1 the Power Plant?

2 A. How many people that came through altogether or
3 just how many people on --

4 Q. On a regular day, how many people would be there,
5 you think, in that time frame?

6 A. The numbers vary, sir. Like I say, it all
7 depends.

8 Q. What were some highs and lows you recall? Do you
9 remember any day that seemed really low?

10 A. Well, like I say, if we were doing a trial, it
11 could be high because at the trial sometimes we have as many
12 as 25, 30 guys there.

13 Q. Okay.

14 A. It's just really, you know, full. And then on a
15 real slow day, say you've got a pay-per-view and half the
16 guys scheduled to wrestle in the pay-per-view in a Thunder
17 or a Nitro on a weekend, something like that, you might have
18 six to eight guys there, sir.

19 Q. Okay. And I take it by your answer who those guys
20 were varied?

21 A. Yes, sir.

22 Q. So that there were more than just those same ten
23 or 15 guys, there were actually a bigger group and some guys
24 weren't there every day; is that right?

25 A. Yes, sir.

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1 Q. Okay. Any idea of roughly how many total people
2 there were coming through during that time frame?

3 A. What's the time frame, sir?

4 Q. 1996, 1997.

5 A. For the whole year, how many people actually came
6 through?

7 Q. Yeah, do you have some sense? And if you don't,
8 that's okay.

9 A. Well, every month they had what you call a
10 three-day trial, so, you know, you average -- on a trial you
11 average anywhere between, I would say, six to 15 guys.

12 Q. Okay. Excepting the guys who came in for the
13 three-day tryouts, looking at the guys who really came in
14 more than the three days to actually work out for some
15 period of time, either for training or for something else,
16 you have some idea of how many guys were there during '96 or
17 there during '97?

18 A. I would say literally probably a hundred guys or
19 more.

20 Q. Okay. So there were an awful lot of guys wanting
21 to be wrestlers?

22 A. Yes, sir.

23 Q. Let me take you to think about your time -- let me
24 jump ahead for a second. Do you recall signing a contract
25 with WCW as a trainee in around April of 1999?

1 A. Yes, sir.

2 Q. Okay. We'll talk about that in a little bit, but
3 using that as a time frame, between the time that you
4 finished your six months of training in 1996, between that
5 time and when you signed your contract, do you remember how
6 many times, roughly, you wrestled in a WCW event?

7 A. I can't recall, sir.

8 Q. Okay. You think it was a couple dozen?

9 A. Yes, sir.

10 Q. More than that maybe?

11 A. I don't remember. I mean, I'm blank on it, sir.

12 Q. Okay.

13 A. I can't really recall.

14 Q. That's fine. Let me see if I can give you
15 something that maybe will help out and we'll go through it
16 for just a few minutes. Mark this as Defendants' 3.

17 (Marked Defendants' Exhibit No. 3.)

18 BY MR. PONTZ:

19 Q. Mr. Norris, you've been handed a clump of
20 documents --

21 A. Yes, sir.

22 Q. -- that are paper clipped together that's been
23 marked Defendants' Exhibit 3.

24 A. Okay, sir.

25 Q. And if we can run through these, I won't take up a

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1 lot of time, but these -- my understanding, and please tell
2 me if you disagree, but my understanding of these are
3 records indicating some of the events that you appeared in
4 for WCW?

5 A. Yes, sir.

6 Q. And the payments that you received and where the
7 events were and when the events were. So let me run through
8 these with you, and if there are any that you don't recall
9 or don't think happened --

10 A. Yes, sir.

11 Q. -- let me know, okay?

12 A. Yes, sir.

13 Q. First page indicates an event fee in Greenwood,
14 South Carolina in October of '96. Do you remember wrestling
15 in October of '96 in Greenwood, or is that not something you
16 recall?

17 A. Yes, sir. I recall wrestling, yes, sir.

18 Q. Do you remember wrestling in Asheville a little
19 bit earlier than that?

20 A. Yes, sir, Asheville, yes, sir.

21 Q. Do you remember these being some of the first
22 events that you got to wrestle in after you finished the
23 training session, training program?

24 A. I can't remember, sir. I mean, time frames, I'm
25 sorry.

1 Q. That's fine. And the next page indicates an event
2 in Florence, South Carolina the following month in November
3 of '96. Do you remember wrestling in Florence, South
4 Carolina at all?

5 A. Yes, sir.

6 Q. Okay. And on both of these pages it indicates
7 \$150. Was that the fee you were paid for wrestling in those
8 events, that you recall?

9 A. Yes, sir.

10 Q. Okay. And you were paid -- each time you wrestled
11 you were paid a set fee, right?

12 A. Yes, sir.

13 Q. Is that the way most of the wrestlers who were at
14 the Power Plant who weren't trained -- or weren't under
15 contract were paid?

16 MR. ICHTER: Object to the extent that that calls
17 for him to speculate.

18 BY MR. PONTZ:

19 Q. Are you aware how other wrestlers like yourself
20 who weren't under contract were paid when they appeared in
21 WCW events?

22 A. No, sir, and the reason why was because all that
23 was kept confidential.

24 Q. Okay.

25 A. Some guys were paid more than others.

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1 Q. Okay. Understanding you may not know how much
2 they were paid --

3 A. Yes, sir.

4 Q. -- do you know, is it your understanding that
5 wrestlers who weren't under contract were in fact paid a fee
6 for each event that they appeared in?

7 A. Yes, sir, I understand that they were paid a fee,
8 sir. I understand.

9 Q. So if you showed up at a wrestling event and
10 wrestled or you showed up because you were asked to be
11 there, you got paid a fee?

12 A. Yes, sir.

13 Q. Okay. You don't know how much that was for
14 different wrestlers?

15 A. I don't know the dollar amount, sir, no.

16 Q. That's fine. The third page of this document
17 there are a couple more events. At the top in December it
18 appears in Dayton, Ohio and Gainesville, Georgia. Do you
19 remember those events?

20 A. I remember wrestling in both cities, sir.

21 Q. Great. And the next page there's an event in
22 Knoxville, Tennessee in December of '96. Is that something
23 you remember?

24 A. I remember being in Knoxville, too, sir.

25 Q. Okay. So it appears from these records, would you

1 agree with me, that the last few months of 1996 you
2 wrestling four, five, six times, whatever those documents
3 amount to? Does that match with your recollection of how
4 often you were wrestling at the end of '96?

5 A. Yes, sir.

6 Q. Okay. And going into '97, it appears in January
7 there was an event in Gainesville again; is that right?

8 A. Yes, sir.

9 Q. Do you remember that?

10 A. I remember being in Gainesville, sir.

11 Q. Okay. On the next page, there's a series of
12 events in Orlando, Florida in February of '97. Are these TV
13 tapings; do you think?

14 A. Yes, sir.

15 Q. Okay. So this was all a period of days where you
16 were down in Orlando for taped wrestling matches?

17 A. Yes, sir.

18 Q. And you were paid to be there every day?

19 A. Yes, sir.

20 Q. Okay. And did you remember wrestling every day or
21 some days? Do you recall that at all?

22 A. I really don't recall, sir, at all.

23 Q. Is this the first time you think you were at a TV
24 taping, maybe a few months after you finished your training
25 session?

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1 A. No, sir, it wasn't the first time I was at a TV --
2 are you talking about in '97, sir?

3 Q. Yeah.

4 A. No, sir, I wasn't at first --

5 Q. You'd been there before?

6 A. You mean as far as Orlando?

7 Q. Yeah. You'd been there before?

8 A. I can't recall, sir, at all.

9 Q. Okay. That's fine. But you remember going down
10 there?

11 A. I remember going down there, yes, sir, I do, sir.

12 Q. TV tapings and wrestling matches?

13 A. Yes, sir.

14 Q. Okay. Then in March of '97 it appears there were
15 some matches in Rome and in Panama Beach.

16 A. Yes, sir.

17 Q. Okay. And it looks like one of them was a higher
18 fee. Do you have any idea why you were paid a higher amount
19 then?

20 A. Yes, sir.

21 Q. Why was that?

22 A. They beat my ass.

23 Q. You got beat up in the match?

24 A. Well, it's not the fact I got beat up in the
25 match. It's the way they went about doing it. Actually,

1 Panama City Beach and actually they -- during a match I was
2 one of the first guys in WCW to have to really, what you
3 call, job to a woman, you know, sort of -- let a woman slap
4 me around, so to speak.

5 Q. As part of the story for the wrestling match?

6 A. Yes, sir.

7 Q. Was that a house show?

8 A. No, sir, it was actually a Nitro, sir.

9 Q. A Nitro?

10 A. Monday Nitro. Actually, I was kind of
11 double-teamed by the booker at the time was Kevin Sullivan
12 and Jacqueline, so --

13 Q. Okay. What was Jacqueline like?

14 A. Person-wise, sir, I really don't know, sir.

15 Q. No, I don't mean -- in terms of her wrestling, was
16 she a large woman, a small woman?

17 A. She was a small woman but she was stiff.

18 Q. She was?

19 A. Stiff. I mean, she could --

20 Q. Well built?

21 A. -- nail you. I mean stiff like in really could
22 lay a lick on you, you know.

23 Q. Okay. So it wasn't like they put you out there
24 with an 80-pound weakling; they put you out with a
25 well-defined wrestling woman?

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1 A. Well, she was about five-one, five-two, maybe
2 135 pounds.

3 Q. Okay.

4 A. You know, compared at the time probably about 215.

5 Q. Was her wrestling character supposed to be pretty
6 strong and tough?

7 A. Yes, it was, sir.

8 Q. Okay. What was her race?

9 A. She was black, sir.

10 Q. Okay. And you knew about that match beforehand, I
11 guess?

12 A. No, sir.

13 Q. When did you find out you were going to do that
14 match with Jacqueline?

15 A. When I got down there, sir.

16 Q. Before --

17 A. Actually, it wasn't a match with Jacqueline. It
18 was a match with Kevin Sullivan, sir.

19 Q. Okay. He was actually wrestling?

20 A. He was wrestling and Jacqueline was a valet.

21 Q. Okay.

22 A. But his character was pretty much throw a guy at
23 the ring and his valet just like rip into him like a pack of
24 wild dogs, so to speak.

25 Q. So correct me if I'm wrong, but you'd be wrestling

1 with Mr. Sullivan, he'd throw you out of the ring and
2 wild -- would he then like distract the referee while his
3 helper would put a licking on you?

4 A. No, actually, he really didn't distract the
5 referee. I was like the guinea pig, so to speak, or the
6 hardest thing as far as wanting to work with the character
7 Kevin Sullivan, help get his character over.

8 Q. Okay. Did you talk about that with Mr. Sullivan
9 at least a little while before the match?

10 A. No, I was told to go do it.

11 Q. Okay. When were you told to go do it?

12 A. About five minutes before I got into the ring,
13 sir.

14 Q. Who told you to do that?

15 A. Kevin Sullivan and Terry Taylor. Well, Terry
16 Taylor was the guy who told me this is what's going to
17 happen and you're going to be the guy to do it, sir.

18 Q. Did you have any problems with doing it?

19 A. Well, I did. At first I did, because I was
20 looking at the size advantages, not only in me and
21 Jacqueline, but me and Kevin, because Kevin is maybe
22 five-seven. You know, I mean, he's stocky.

23 But at the same time, but what can you say? The
24 guy's up in the totem pole as far as in the company, and
25 versus to me just trying to get in the company. So it was

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1 one of the type of things, like, well, if I do this, maybe
2 I'm in.

3 Q. And this was on televised Nitro?

4 A. Yes, it was.

5 Q. Which is a high-profile event for WCW?

6 A. Very high profile, sir.

7 Q. Okay. And did you believe that that -- this was a
8 story line, right, to get, as you said, Mr. Sullivan's
9 character over?

10 A. Yes, sir. We definitely got his character over
11 because, according to the ratings, it was really off the
12 charts, and at the same time when WCW were going head to
13 head with WWF and that match was in the ring when they were
14 beating the crap out of me, and the more that they did to
15 me, the higher the ratings went.

16 And on other channels they had Stone Cold in the
17 match with the Undertaker at that time, which our match drew
18 higher ratings, but at the same time was a nobody.

19 Q. Who told you your match drew higher ratings?

20 A. Excuse me?

21 Q. Who told you your match drew --

22 A. I pulled it off the internet.

23 Q. Do you still have the documents?

24 A. I don't know if I have it or not, but I can check
25 and see.

1 Q. That would be great, if you'd take a look for
2 that, we'd appreciate it, and if you find those documents,
3 if you'd provide them to your attorney.

4 A. Yes, sir.

5 Q. Did you believe that that story line of you
6 getting beat up by Jacqueline was a racist story line?

7 A. Getting beat up by Jacqueline was a racist story
8 line? To a point I think it was, but then to a point I
9 thought it was more, I want to say training abuse, but I'd
10 say abuse.

11 And the reason I would say that was because
12 there's at least 20 guys down at the Power Plant a lot
13 smaller than me could have did that, you know.

14 At the time when I did that match for Kevin
15 Sullivan, I had won 18 Tough Man's. I was on television
16 myself fighting in Tough Man, knocking guys out with one
17 punch. Then I was told pretty much to just go out there and
18 just let the woman slap you around on the beach with 20 some
19 thousand people.

20 Q. Do you think it may be more entertaining to see
21 Jacqueline beat up a pretty credible looking wrestler rather
22 than beat up a lesser looking wrestler?

23 A. Well --

24 Q. Do you think that had something to do with maybe
25 why it was a successful event, if you know?

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1 MR. ICHTER: I'm going to object to the extent
2 that it calls for him to speculate as to why it was a
3 successful event.

4 BY MR. PONTZ:

5 Q. Okay. But go ahead and answer the question,
6 Mr. Norris. What are your thoughts on do you think it was
7 effective to have Jacqueline beat up someone who looked like
8 you in terms of your size and your physicality?

9 A. Well, to me it make it look a lot more believable,
10 sir, if she would whoop somebody more her size compared with
11 somebody twice her size, especially with somebody who's on
12 television on another station, Fox, pulling their ratings in
13 saying this is our toughest guy right here.

14 Q. Okay. But in terms of a wrestling match, they're
15 trying to create something -- when you wrestle, you're not
16 just an athlete but you're an actor, right?

17 A. A character pretty much say, sir.

18 Q. So it's your responsibility to pull it off, to
19 make the fans believe it or enjoy it or something like that?

20 A. Correct, sir.

21 Q. Okay. And you don't -- do you have an opinion on
22 whether it was entertaining and enjoyable for the fans to
23 see this match go the way it went?

24 A. It's entertainment majority of the fans if, you
25 know, like I say, if everybody is going to get positive

1 grounds out of it. I didn't get any positive ground out of
2 it. I wind up had to buy new boots out of it, you know,
3 because they threw them in the pool with chlorine, ruin my
4 boots and things of that nature.

5 And at the same time, you know, I have to go back,
6 you know, once again, to another network that I'm trying to,
7 you know, do things with, as well, and say, well, hey, what
8 are you doing getting beat up by a woman. Here you just
9 knocked out a guy with one single punch.

10 Q. Let me back up a little bit then and ask you, you
11 were working Tough Man competitions at the same time you
12 were wrestling for -- trying to become a wrestler with WCW;
13 is that correct?

14 A. Yes, I was.

15 Q. Okay. Were you paid for the Tough Man
16 competitions?

17 A. Yes, I was.

18 Q. How much were you paid for the Tough Man?

19 A. Well, it all depends what show I was at. Some of
20 the shows paid a thousand to 3500, and then the Worlds pay
21 50,000.

22 Q. Okay. Did you ever make \$50,000 in the Worlds?

23 A. Yes, I did.

24 Q. When was this?

25 A. Last year. I'm the defending champion.

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1 Q. This was in 2001?

2 A. Yes, sir.

3 Q. Okay. How about in 1996, do you remember what you
4 made?

5 A. I don't remember, sir.

6 Q. Okay. How about in 1997, do you remember what you
7 made in Tough Man competitions?

8 A. No, sir, I don't remember, sir.

9 Q. Okay. You understand that the Tough Man
10 competitions are real, correct?

11 A. Yes, sir.

12 Q. And the WCW wrestling is not real?

13 A. Correct, sir.

14 Q. It's scripted and --

15 A. Yes, sir, it is.

16 Q. -- written out the way someone believes is going
17 to be entertaining?

18 A. Correct, sir.

19 Q. Okay. So the purpose of the Tough Man competition
20 is to put two real strong athletes together?

21 A. Correct, sir.

22 Q. And see who comes out?

23 A. Correct, sir.

24 Q. Okay. And the wrestling is different than that,
25 isn't it?

1 A. Very different, sir.

2 Q. Okay. That's fine. Let's go back to the document
3 we were looking through.

4 MR. ICHTER: Now, hold on a minute.

5 MR. PONTZ: Mr. Ichter, I'm going to --

6 MR. ICHTER: Are you saying this stuff is not
7 real?

8 MR. PONTZ: Thank you. I think we've long
9 established that.

10 MR. ICHTER: Okay.

11 BY MR. PONTZ:

12 Q. Mr. Norris, let me go back to this document, and I
13 think there was a page, I'm not sure whether you looked at
14 it or not, in March of '97, a wrestling match in Dalton,
15 Georgia.

16 A. Yes, sir.

17 Q. Do you remember that?

18 A. Yes, sir.

19 Q. Okay. And on the next page there's an indication
20 of a match in Johnson City, Tennessee, down at the bottom of
21 the next page. Do you remember wrestling in Johnson City?

22 A. Yes, sir.

23 Q. Okay. And there's some other indications up there
24 of some other matches. Do you remember why those were paid
25 different? Were you paid an additional amount later for a

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1 match you had previously done; do you remember whether that
2 happened or not?

3 A. I can't recall, sir. I'm sorry.

4 Q. Okay. That's fine. On the next page there's a
5 match in Gainesville in March of 19 -- actually, April of
6 1997, right?

7 A. Yes, sir.

8 Q. Do you remember your amount of appearance fee
9 going up to \$300 around that time?

10 A. Yes, sir.

11 Q. Okay. Do you know why that was?

12 A. I think the whole deal was it was a couple of guys
13 at the Power Plant figured out that all the blacks were
14 getting paid a lot lower to do what we call jobs on
15 television than the white guys, and somebody brung it to the
16 bookers' attention and so forth and they said, well, okay,
17 then do this.

18 Q. Do you know if that happened or is that just a
19 rumor that you heard?

20 A. A rumor, sir.

21 Q. So you don't know who made the decision?

22 A. I have no proof, sir.

23 Q. And you don't know who made the decision on how
24 much you were getting paid at any time?

25 A. No, sir, I didn't.

1 Q. On the next page we've got another group of events
2 in Orlando, right? More TV tapings?

3 A. Yes, sir.

4 Q. And this is six, seven events; six, seven days, I
5 guess?

6 A. Yes, sir.

7 Q. Okay. And then the next page is a match in
8 Chattanooga, Tennessee.

9 A. Yes, sir.

10 Q. Okay. And the next page a match in Birmingham,
11 Alabama?

12 A. Yes, sir.

13 Q. And the next page a match in Dalton, Georgia?

14 A. Yes, sir.

15 Q. And then the next page it appears there's another
16 few days in Orlando?

17 A. Yes, sir.

18 Q. Four more days? Yes?

19 A. Yes, sir.

20 Q. Okay. And then the next page four more days in
21 Orlando in July?

22 A. Yes, sir.

23 Q. Okay. And then the next page an event in Dalton
24 and then four more days in Orlando?

25 A. Yes, sir.

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1 Q. Okay. And then the next page, some days in Tampa
2 and Ft. Myers and Orlando wrestling?

3 A. Yes, sir.

4 Q. Okay. And then that's '97. The next page looks
5 like it gets into 1998, right?

6 A. Yes, sir.

7 Q. Okay. So that looks like a whole bunch of
8 appearances in 1997. Is that about your recollection --

9 A. Yes, sir.

10 Q. -- of the places you were wrestling and the
11 appearances you had in 1997?

12 A. Also in '97, the only thing I see actually
13 missing, sir, from here was some stuff that we actually did
14 what you call -- I did some like pay-per-views appearance
15 for -- they shot the video footage as far as the
16 pay-per-views and I appeared in a lot of those.

17 Q. And you were paid for those?

18 A. Yes, sir.

19 Q. Paid a set fee when you showed up to a video
20 appearance?

21 A. I don't know what the fee was, sir.

22 Q. You don't remember?

23 A. A lot of time they say, well, you know, we need
24 some guys from the Power Plant, you know, and usually when
25 they pick guys from the Power Plant, I was one of the first

1 guys that was picked.

2 Q. Okay. So they'd grab a handful of guys and they'd
3 always grab you, you think?

4 A. Yes, sir.

5 Q. Okay. And then real briefly just go through some
6 of these 1998 documents. We've got Rome and then a couple
7 days in Orlando in the beginning of 1998, right?

8 A. Yes, sir.

9 Q. And then Atlanta February of '98?

10 A. Yes, sir.

11 Q. And then Ozark, Alabama, March of '98?

12 A. Yes, sir.

13 Q. And the next page, Madison, Wisconsin, and then
14 three more days in Orlando?

15 A. Yes, sir.

16 Q. And then Atlanta in May '98?

17 A. Yes, sir.

18 Q. Okay. And then next page it looks like there's an
19 event in Saginaw, Michigan in June of 1998?

20 A. Yes, sir.

21 Q. And the next page some more events in Orlando?

22 A. Yes, sir.

23 Q. And next page an event in Macon in July of '98?

24 A. Yes, sir.

25 Q. Okay. And the next page another event in

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1 Gainesville?

2 A. Yes, sir.

3 Q. Okay. Is that your recollection of some of the
4 events you were at --

5 A. Yes, sir.

6 Q. -- in '98? Do you think there may have been some
7 others?

8 A. I can't recall, sir, I'm sorry, this time frame.

9 Q. That's fine. You think the talent fees that are
10 on those documents reflect what you got paid for each of
11 those events?

12 A. Yes, sir.

13 Q. Okay. Great. And you said you don't know who
14 made the decision on how much you were going to get paid in
15 any of the events, right?

16 A. Correct, sir.

17 MR. PONTZ: All right. Great. Why don't we take
18 a quick break, stretch our legs.

19 (Whereupon, a brief recess was taken.)

20 BY MR. PONTZ:

21 Q. Mr. Norris, let me continue some of my questions.
22 We talked about -- we went through some documents that
23 showed a lot of matches that you wrestled in with WCW,
24 right?

25 A. Yes, sir.

1 Q. Okay. And I assume some of these matches were
2 live before audiences?

3 A. Yes, sir.

4 Q. And some of them were taped for replay later,
5 right?

6 A. Yes, sir.

7 Q. Were there live audiences when you did the taped
8 shows, too? Were there people there watching or was it just
9 purely --

10 A. People was there also, sir.

11 Q. Okay. And you appeared on some Nitros?

12 A. Yes, sir.

13 Q. And you were involved in some pay-per-views?

14 A. Actually, I did a commercial for some of the
15 pay-per-views, sir.

16 Q. Okay. Did you ever wrestle in any of the
17 pay-per-views?

18 A. No, sir.

19 Q. Okay. You appeared in some house shows and
20 Saturday night shows and other shows like that?

21 A. Yes, sir.

22 Q. Okay. Do you remember any of the folks you
23 wrestled against? You mentioned Mr. Sullivan. Do you
24 remember some of the other folks you wrestled against?

25 A. Yes, sir.

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1 Q. Who were some of the folks you wrestled against?

2 A. Glacier, Disco Inferno, Kevin Sullivan. I can't

3 remember the Japanese guy's name. I can't pronounce them,

4 but --

5 Q. Japanese wrestler?

6 A. Yes, sir.

7 Q. Okay. Anybody else?

8 A. Hugh Morris, Barry Horowitz, Johnny Swinger.

9 Q. Anybody else?

10 A. There's lots of guys.

11 Q. Those are the ones you can remember right now?

12 A. Yes, sir, they're the ones I can remember right

13 now.

14 Q. Anybody else you can think of that you can

15 remember right now?

16 A. I can't remember right off the top of my head.

17 Q. Did you wrestle mostly as a solo, not as a tag

18 team?

19 A. Yes, sir, mostly solo.

20 Q. A few times as a tag team?

21 A. Very few times, sir.

22 Q. Okay. Do you remember any of your tag team

23 partners?

24 A. Yes, sir.

25 Q. Who were your tag team partners that you recall?

1 A. I only had pretty much maybe one, Buddy Lee
2 Parker.

3 Q. And that's Dwayne Bruce, right?

4 A. Correct, sir.

5 Q. You won some of your matches?

6 A. No, sir.

7 Q. You won none of your matches?

8 A. I only won one of my matches, sir.

9 Q. Which match did you win?

10 A. I can't remember what town it was in. It was a
11 house show, sir.

12 Q. Okay.

13 A. Non-television show, sir.

14 Q. Who were you wrestling in that you won the house
15 show?

16 A. Chuck Palumbo, sir.

17 Q. Okay. White wrestler?

18 A. Yes, sir.

19 Q. And do you remember what year that was?

20 A. No, sir.

21 Q. Okay. And you're aware there are wrestlers who
22 win very few of their matches in their careers; isn't that
23 correct?

24 A. Yes, sir.

25 Q. Okay. Do you know who some of those wrestlers

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1 are? Do you know any wrestlers who never won a match or won
2 very few in their careers?

3 A. Never won any match? Probably me, sir.

4 Q. Anybody besides you? You won one at least, right?
5 You told us that.

6 A. Well, sir, I would say Tony Carr, maybe, sir. I
7 never seen him win any matches.

8 Q. Anybody besides Mr. Carr that you remember not
9 winning any matches?

10 A. That's about the only one I can recall right now,
11 sir, off the top of my head.

12 Q. Did you ever hear that Terry Taylor never won a
13 match?

14 A. Excuse me, sir?

15 Q. Did you ever hear that Terry Taylor never won a
16 match when he was wrestling?

17 A. Never heard of it, sir.

18 Q. Okay. You never heard of him or you never heard
19 of Terry Taylor?

20 A. I heard of Terry Taylor. I never heard that he
21 never won a match, sir.

22 Q. Okay. That's fine.

23 A. I can recall Terry Taylor having a belt before,
24 sir.

25 Q. You do?

1 A. In order to get a belt, you've got to win, sir.

2 Q. When was this?

3 A. I don't know, but I'm pretty sure -- when we got
4 down to the Power Plant they used to have a lot of tapes and
5 we watched and studied. I'm the type of guy, if I'm going
6 to get better, I've got to watch and study things, and I
7 watched one of the tape and he came out with a belt on, sir.

8 Q. Okay. But you do know there are some wrestlers
9 who are always bad guys who always lose or --

10 A. There's nothing wrong with always losing, sir, as
11 long as you're getting paid the equivalent to make up for
12 the difference.

13 Q. Okay.

14 A. That's the right way of doing things, sir.

15 Q. Okay. Sounds good. Now, as far as your time
16 training at the Power Plant, and this is before you were
17 contract with WCW.

18 A. Yes, sir.

19 Q. During the time before that, if you had something
20 else you had to take care of, personal matter, health
21 matter, things like that, you could go attend to that and
22 not come to the Power Plant to train, right?

23 A. Well, I never really had a chance to take care of
24 my personal things. We always was instructed if you've got
25 anything else, you do one of two things, you do it after you

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1 leave the Power Plant.

2 Q. Okay.

3 A. That's what we was told, or you do it at your
4 lunchtime, sir.

5 Q. Okay. Did you ever ask to miss time from the
6 Power Plant so you could go take care of anything?

7 A. No, sir.

8 Q. So you don't know if you would have been given
9 permission or not?

10 A. I didn't want to take that risk, sir.

11 Q. Okay. That's fine. Did you ever miss time from
12 training at the Power Plant because you were sick or you
13 were hurt?

14 A. No, sir, but I've missed time with being, you
15 know, if they said, if the team was on Tuesdays and they
16 told me to be in Rome, Georgia on Tuesday, then I couldn't
17 be at the Power Plant in Rome, so I went to Rome.

18 Q. Okay. So when you were wrestling someplace and
19 you had to travel there, you didn't -- obviously you weren't
20 at the Power Plant when you had to travel?

21 A. Correct, sir.

22 Q. But you don't recall ever missing time for being
23 sick or hurt or anything like that?

24 A. The only time I did get sick I was at the Power
25 Plant, sir.

1 Q. You came anyway?

2 A. I came anyway.

3 Q. What did you do when you were sick?

4 A. Actually what I did, I worked out, I trained, and
5 I reviewed some of the footage and films of some of the
6 guys' matches, and I still did two matches that day with
7 other guys that needed help, sir.

8 Q. Okay. And obviously when you wrestled, one of the
9 things you bring to the wrestling match are the unique
10 skills and abilities that you've developed in training and
11 through your Tough Man competitions, things like that,
12 right?

13 A. Yes, sir.

14 Q. So you bring -- your character wrestling was
15 Hardbody Harrison or Hardbody Harrison Norris, right?

16 A. Yes, sir.

17 Q. Where did you come up with Hardbody?

18 A. I just looked at my body. I said, well, I'll do
19 this, sir.

20 Q. Just seemed to fit you?

21 A. Yes, sir.

22 Q. Okay. And what did your character wear when you
23 wrestled in matches? What kind of outfit did you wear?

24 A. I started off when I first started wrestling, sir,
25 I had braids in my hair. I had it braided to one side, and

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1 I wore one leg tight, short tight and with no shirt, and I
2 just come out with a leather jacket on, sir.

3 Q. And that was the costume you came up with?

4 A. Yes, sir.

5 Q. Okay. And did you do things -- do other things
6 with your hair and your outfits?

7 A. Yes, sir, I changed it later on, sir. And the
8 reason I changed that later on, because, as you can see from
9 the paperwork, I lost so many matches, a lot of time when
10 you come out, the kids say, oh, I know this guy, he's a
11 jobber, he's going to lose. As soon as you walk out the
12 guys knew that -- I mean, the kids knew that, so I'd change
13 it up and make them think I was a different wrestler anyway,
14 sir.

15 Q. Change your hairstyle, your outfit, your look?

16 A. Yes, sir. Colors of my outfits, my hairstyle,
17 things that -- color of my hair, things of that nature, sir.

18 Q. Did you ever think of changing your ring name from
19 Hardbody to something else?

20 A. Yes, sir, I did.

21 Q. When did you think about that?

22 A. No, I didn't change it, but you asked me did I
23 thought about it. I thought about changing it.

24 Q. Right. When did you think about changing it?

25 A. Probably after the first ten or 15 matches they

1 just squash you, you know.

2 Q. What, did you come up with any other options?

3 A. Yes, sir, I did, sir.

4 Q. What did you come up?

5 A. Colorado Crusader, sir.

6 Q. How come you didn't change your name to that?

7 A. I wasn't allowed to, sir.

8 Q. Who said you weren't allowed to?

9 A. Terry Taylor, sir.

10 Q. When was this?

11 A. About, like I said, sir, probably after my first
12 ten or 15 matches on television, sir.

13 Q. Did Mr. Taylor tell you why you shouldn't use the
14 name Colorado Crusader?

15 A. No, sir.

16 Q. So you don't know why he --

17 A. No, sir.

18 Q. Any other names you thought up?

19 A. No, sir.

20 Q. Anybody ever tell you you ought to think of
21 changing your name or anything like that?

22 A. At one time Mr. Jimmy Hart, he thought of a
23 character that might be suitable for me and something that
24 the company could do with me, but it didn't go through, sir.

25 Q. What was that?

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1 A. Actually it's the same -- pretty much the same
2 deal that actually New York wanted I guess in the tour, and
3 they did it with -- I'm trying to think of his name, the
4 Godfather, his type character, sir.

5 Q. Mr. Hart came up with that idea?

6 A. Yes, sir.

7 Q. Did he talk to you about it?

8 A. Yes, sir, he did, sir.

9 Q. Did you like the idea?

10 A. Yes, sir, I did.

11 Q. Okay. And you were willing to do it?

12 A. I was willing to do it, but I told him I thought
13 it was kind of a bit rare because I thought it was kind of
14 pushes the buttons on as far as race ethnic thing.

15 Q. Why was that? Why did you think that?

16 A. Well, I thought it was, you know, just pretty much
17 degrading type deal, but once again, I wasn't in no position
18 to bargain, you know.

19 Q. Right.

20 A. I was trying to feed my family, sir.

21 Q. Okay. But other than Mr. Hart talking to you
22 about that idea, no one actually ever said, all right, let's
23 use that character for you?

24 A. Well, I think for a moment, like I said, I don't
25 know who all he talked to about it, you know, and when they

1 considered it, but I'm pretty sure he got pretty much file
2 13, you know.

3 Q. What do you mean by that? They decided not to do
4 it?

5 A. Well, yeah, because I kind of, you know, me,
6 myself, kind of said, well, you know, I don't think that's
7 really something that I should be doing because it's
8 degrading.

9 Q. You said that to Mr. Hart?

10 A. Yes, I did.

11 Q. Okay. Did you ever hear about that proposal after
12 that conversation with Mr. Hart?

13 A. No, I didn't.

14 Q. And you don't know who Mr. Hart talked to about it
15 or --

16 A. No.

17 Q. -- who made any decisions about it or anything?

18 A. No.

19 Q. And it's true you were around wrestling for a few
20 years, right?

21 A. Yes, sir.

22 Q. In your experience, did you ever have times where
23 you found that something you thought would be really
24 successful with the fans, kind of get over with them, didn't
25 work, some gimmick or some story line? Did you ever see --

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1 A. That didn't work?

2 Q. That didn't work. Did you ever look at a story

3 line or a gimmick and say, gee, I think that will go over

4 well and then it didn't?

5 MR. ICHTER: Are you asking him --

6 MR. PONTZ: Yeah.

7 MR. ICHTER: -- about his story --

8 BY MR. PONTZ:

9 Q. His own -- no. Just any -- was there ever a time
10 that you saw a wrestling character or gimmick and said to
11 yourself, gee, I think that will be terrific, I think the
12 fans will like it, and then your understanding was it didn't
13 work out or the fans didn't like it? Do you remember that
14 happening?

15 A. Sure. I mean --

16 Q. Can you tell me any specific instance like that
17 that you recall.

18 A. Glacier.

19 Q. You thought it would be cool?

20 A. Well, you know, I thought it would be real cool.
21 I thought it was a ripoff of the Subzero from the Mortal
22 Combat series.

23 Q. Right. And that idea didn't work out, did it?

24 A. No, sir, it didn't.

25 Q. It wasn't popular at all?

1 A. No, sir.

2 Q. Okay. Was there ever any other instances you can
3 think of like that?

4 A. That's about it, sir.

5 Q. Okay. Ever any instances where you saw a
6 character or a story line where you said to yourself, that's
7 just stupid or that's not going to work or that's never
8 going to get over and turns out that it did?

9 A. Yes, sir.

10 Q. Like what? What can you remember?

11 A. I would say the Goldberg thing, sir.

12 Q. You didn't think Goldberg would be a success?

13 A. Well, I knew he would be a success because he had
14 the look and the build.

15 Q. But you didn't think his name would work?

16 A. No, it wasn't his name. It was the way they went
17 about other guys, we call it squashing, you know.

18 Q. You didn't think the way they portrayed that story
19 was going to work out as successfully as it did?

20 A. No, I didn't think -- not that I didn't think the
21 story would work, the way they portrayed it. It's the way
22 they crush other guys who built 18, 15 years in this
23 business and the way they're just crushing their careers,
24 because, once again, you're building up one guy to tear down
25 20 other guys. I mean, the kids look up to them guys just

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1 as well before they looked up to Goldberg.

2 Q. So he was squashing everybody he was wrestling
3 against?

4 A. Pretty much.

5 Q. White guys and non-white guys?

6 A. Correct.

7 Q. Is it your opinion or understanding that sometimes
8 what the creative people come up with or what the wrestlers
9 come up with just doesn't work out the way people hoped?
10 Does that happen sometimes?

11 A. I don't know. I'm never in on the creative
12 control meetings, sir.

13 Q. Okay. So you don't know whether --

14 A. I don't know, sir.

15 Q. -- whether sometimes they come up with a gimmick
16 that doesn't work and --

17 A. We won't know, sir, until they show it on
18 television. I mean, they are so top secret about it, we
19 don't know until you see it on television.

20 Q. And sometimes some of the stuff you see on
21 television you never see repeated again?

22 A. Correct, sir.

23 Q. And sometimes it goes on and on and on?

24 A. Yes, sir.

25 Q. Okay. I think you told me earlier that you didn't

1 work other jobs while you were wrestling for WCW.

2 A. Well, what I said was I ran my boxing and my
3 wrestling.

4 Q. Okay. And you also competed in the Tough Man
5 competitions?

6 A. Correct, yeah.

7 Q. Were there times you were away from the Power
8 Plant because you were appearing in a Tough Man competition?

9 A. Tough Man is on weekends and at night time.
10 Usually Tough Man will only let you do a show you're within
11 50 to 75-mile radius. So even if I left at 5:00 o'clock,
12 5:30, I still would make it to anyplace around the Atlanta
13 area, you know.

14 Q. So all your Tough Man appearances while you were
15 still with WCW were in the Atlanta area?

16 A. Correct, with the exception of a couple local that
17 they fall like on a Saturday, especially Saturday and Sunday
18 they did a couple of those.

19 Q. Where were they?

20 A. South Carolina.

21 Q. Okay. And you were able to get up there?

22 A. Yes, sir.

23 Q. And you mentioned appearing in some video shoots
24 and things like that with WCW.

25 A. For the pay-per-view, yes, sir.